

CULLEN & DYKMAN LLP
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Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:
In re:	: Chapter 11
	:
JOSEPH KLAYNBERG,	: Case No. 22-10165 (MG)
	:
	:
Debtor.	:
	:
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**NOTICE OF MONTHLY FEE STATEMENT FOR DEBTOR'S COUNSEL
FOR THE MONTH OF JULY 2022**

PLEASE TAKE NOTICE that pursuant to the Order of the Bankruptcy Court dated March 11, 2022 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, the Monthly Fee Statement for Debtor's Counsel for the month of July 2022 is attached hereto.

Dated: Garden City, New York
August 12, 2022

CULLEN AND DYKMAN LLP
Counsel for Debtor

By: s/ Bonnie Pollack
Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
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Cullen Dykman

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Tax ID: 11-0658700

JOSEPH KLAYNBERG

August 3, 2022

INVOICE SUMMARY

File Number: 22420

Control Number 6992378

FOR PROFESSIONAL SERVICES rendered through July 31, 2022 in connection with the matters referenced below, as more fully detailed on the attached.

Matter #	Matter Description	Fees	Costs	Total
1	GENERAL ADMINISTRATION	2,628.50	.00	2,628.50
3	ASSET DISPOSITION, SALE OR RESTRUCTURE	13,792.50	.00	13,792.50
4	RESOLUTION OF CREDITOR ISSUES	8,534.00	.00	8,534.00
6	PLAN & DISCLOSURE STATEMENT	23,230.50	.00	23,230.50
8	RETENTION/PROFESSIONAL COMPENSATION/FEE	10,590.00	.00	10,590.00
9	PREPARATION FOR/ATTEND COURT HEARING	7,077.00	.00	7,077.00
12	OPERATING REPORTS	459.00	.00	459.00
13	DISBURSEMENTS	.00	1,180.47	1,180.47
14	TRAVEL	4,755.00	.00	4,755.00
16	NAHLA 2004 MOTION	31,166.50	.00	31,166.50
Total		102,233.00	1,180.47	103,413.47

TOTAL THIS INVOICE

\$ 103,413.47

FOUNDED 1850

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Tax ID: 11-0658700

JOSEPH KLAYNBERG

August 3, 2022

For Professional Services Rendered Through July 31, 2022:

File Number: 22420-1

Control Number 6992378

RE: GENERAL ADMINISTRATION

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/11/22	BLP	Emails with chambers re hearing date for various motions	.20	153.00
7/11/22	BLP	Lengthy discussion with A. Thaler re plan, adversary proceeding strategy and case strategy	.70	535.50
7/13/22	BLP	Further comms with court re hearing date for various hearings	.20	153.00
7/15/22	BLP	Letter to court with all filings (.3); conference re service of all documents and review of AOSs for filing (.3)	.60	459.00
7/25/22	BLP	Review and respond to emails with UST re plan and fee applications	.20	153.00
7/28/22	BLP	Prepare and file supplemental disclosures re Valley National Bank	.60	459.00
7/28/22	BLP	Lengthy discussion with client re Laz proposal, deposition prep, sales of interests	.40	306.00
7/28/22	MGR	Review supplemental disclosure and provide comments	.50	410.00
TOTAL PROFESSIONAL SERVICES				\$ 2,628.50
TOTAL THIS MATTER				\$ 2,628.50

JOSEPH KLAYNBERG
22420-001-3

Control #: 6992378
August 3, 2022

RE: ASSET DISPOSITION, SALE OR RESTRUCTURE

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/05/22	BLP	Comms with Connecticut entity counsel re status of offer for interests	.20	153.00
7/05/22	BD	Attention to / review marital agreement to determine capital gains tax issues re: sale	.70	441.00
7/06/22	BLP	Discussion with B. Diaz re gains tax research and results	.30	229.50
7/06/22	BD	Research gains tax issues re dispositions of property for capital gains issues in connection with divorce	2.40	1,512.00
7/06/22	BD	Discuss gains tax issues with Bonnie Pollack	.30	189.00
7/07/22	BLP	Work on sale motion for Sands Point	1.60	1,224.00
7/07/22	BLP	Conference with M. Roseman re Sands Point sale issues, Chase mortgage, etc. (.3); discussion with F. Stevens re contract of sale, closing timing, Chase (.3)	.60	459.00
7/07/22	BLP	Conferences with C. Mullen re contract for Sands Point, issues to revise	.30	229.50
7/07/22	BLP	Work on motion for sales process for equity interests	2.10	1,606.50
7/08/22	BLP	Continued work on Sands Point sale motion	.90	688.50
7/11/22	BLP	Work on sale motion (Sands Point)	.90	688.50
7/12/22	BLP	Work on Sands Point contract	1.40	1,071.00
7/12/22	BLP	Revisions to Sands Point motion re contract provisions	.30	229.50
7/12/22	MGR	Review sales motion	.50	410.00
7/13/22	BLP	Review buyer changes to contract (.2); conference with C. Mullen re same (.2); emails with buyer counsel re same (.12)	.60	459.00
7/14/22	BLP	Emails with buyer counsel and client re contract execution and deposit (Sands Point) (.2); discussion with client re sale issues for all assets (.3)	.50	382.50
7/14/22	BLP	Finalize Sands Point sale motion	.50	382.50
7/20/22	BLP	Lengthy discussion with S. Consoli and J. Beck re sale of Connecticut interests and terms of proposal re stalking horse bid	.50	382.50
7/21/22	BLP	Discussion with counsel to Chase re motion to sell, treatment of claim in case	.20	153.00

JOSEPH KLAYNBERG
22420-001-3

Control #: 6992378
August 3, 2022

Date	Init	Description	Hours	Amount
7/21/22	BLP	Email to Emily Klaynberg counsel re payment of Chase mortgage	.10	76.50
7/26/22	BLP	Discussion with Hilco re proposed equity sale process and retention potential	.50	382.50
7/26/22	BLP	Discussion with F. Stevens re demand to pay Chase mortgage, Chase issues	.30	229.50
7/26/22	MGR	Conf regarding satisfaction of Chase mortgage by Emily as condition to closing	.30	246.00
7/26/22	MGR	Review and discuss emails concerning sales process of ownership interests	.50	410.00
7/27/22	MGR	Review materials from Hilco regarding sale of equity interests (.3); Discuss same w/ B Pollack (.2)	.50	410.00
7/28/22	BLP	Several comms with Chase and F. Stevens re Chase issues with sale, plan, payment of mortgage by Emily needed, need to modify contract re same	.90	688.50
7/28/22	BLP	Review Laz proposal for certain interests in greater depth (.3); discussion with J. Beck and S. Console re questions re same (.3)	.60	459.00
TOTAL PROFESSIONAL SERVICES				\$ 13,792.50
TOTAL THIS MATTER				\$ 13,792.50

JOSEPH KLAYNBERG
22420-001-4

Control #: 6992378
August 3, 2022

RE: RESOLUTION OF CREDITOR ISSUES

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/14/22	BLP	Review proposed prenegotiation letter re 114 MS obligations (.2); conference with M. Roseman re ability to execute, issues re same (.2)	.40	306.00
7/14/22	BLP	Review estate issues attendant to restructuring of CRDA obligations	.30	229.50
7/14/22	BLP	Comms with client re various restructuring issues regarding equity interests, impact on estate and interplay with same	.40	306.00
7/15/22	BLP	Conference with M. McMahon re 114 MS pre-negotiation letter and issues and strategy re same	.50	382.50
7/15/22	MKM	Teleconference with B. Pollack regarding creditor issues on guarantees	.40	286.00
7/15/22	MKM	Review notices and draft prenegotiation letter and email B. Pollack regarding same.	.60	429.00
7/19/22	BLP	Discussion with M. McMahon re issues with Rialto prenegotiation letter, and advise for client re same, further issues which may arise re matter (.4); email to client re advise on issue (.1)	.50	382.50
7/19/22	MKM	Teleconference with B. Pollack regarding prenegotiation letter, guaranty claim and loan workout.	.40	286.00
7/20/22	BLP	Discussion with M. Bunin re Valley debt, requested reinstatement, etc.	.20	153.00
7/21/22	BLP	Discussion with B. Procida re Wilmington Trust claim, case, plan administrator, pre-negotiation letter from Rialto	.50	382.50
7/21/22	BLP	Further emails with B. Procida re negotiations on 114 MS debt	.20	153.00
7/26/22	BLP	Review Morgan Stanley notice issues for claim allowance purposes	.40	306.00
7/27/22	BLP	Continued review of 114 MS guaranty/notice issues (.3); emails with B. Procida re same, call re claim, PA issues (.2)	.50	382.50
7/28/22	BLP	Brief review of Spectra refi documents (.3); comms with M. McMahon re thorough review of same, issues, strategy (.4)	.70	535.50
7/28/22	BLP	Discussion with B. Procida re claim, STN issues	.20	153.00
7/28/22	MKM	Review amended loan documents and teleconference with B. Pollack.	1.00	715.00
7/29/22	MKM	Review loan modification documents.	4.40	3,146.00

JOSEPH KLAYNBERG
22420-001-4

Control #: 6992378
August 3, 2022

TOTAL PROFESSIONAL SERVICES	\$ 8,534.00
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TOTAL THIS MATTER	\$ 8,534.00
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JOSEPH KLAYNBERG
22420-001-6

Control #: 6992378
August 3, 2022

RE: PLAN & DISCLOSURE STATEMENT

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/05/22	BLP	Continued extensive drafting of plan	4.90	3,748.50
7/06/22	BLP	Revise proposed plan	2.40	1,836.00
7/06/22	BLP	Comms with M. Roseman re questions on plan, strategy re same	.50	382.50
7/06/22	MGR	Conf w/ B Pollack to review comments to plan	.50	410.00
7/07/22	BLP	Revise and circulate draft plan for discussion with Debtor and Special Counsel	.90	688.50
7/11/22	BLP	Discussions with client re plan, comments, concepts	.80	612.00
7/11/22	MGR	Conf call w/ client regarding marketing professionals for asset classes	.50	410.00
7/13/22	BLP	Work on preparation of disclosure statement in case	2.60	1,989.00
7/13/22	BLP	Revisions to plan	.90	688.50
7/13/22	BLP	Comms re disposable income analysis needed for disclosure statement (.2); review claims and calculate distributions for disclosure statement purposes (.3)	.50	382.50
7/13/22	MGR	Review revisions to plan	.50	410.00
7/14/22	BLP	Extensive work on disclosure statement and attachments to same	3.70	2,830.50
7/14/22	BLP	Prepare motion to approve disclosure statement with order, ballot and notice	1.60	1,224.00
7/14/22	BLP	Discussion with accountants re disposable income projections for disclosure statement	.30	229.50
7/14/22	MGR	Review and make comments and revisions to disclosure statement	2.00	1,640.00
7/14/22	MGR	Conf w/ B Pollack regarding comments to disclosure statement and revisions	.70	574.00
7/14/22	MGR	Review comments to disclosure statement from A Thaler	.30	246.00
7/15/22	BLP	Extensive work to finalize plan, disclosure statement, liquidation analysis	4.10	3,136.50
7/15/22	BLP	Call with client and accountants re disposable income projections (.4); review and comment on exhibit for plan re same (.3)	.70	535.50

JOSEPH KLAYNBERG
22420-001-6

Control #: 6992378
August 3, 2022

Date	Init	Description	Hours	Amount
7/20/22	BLP	Discussion with A. Thaler re outcome of STN hearing, next steps re plan (.3); conference with M. Roseman re same (.3)	.60	459.00
7/20/22	MGR	Discuss amending plan and disclosure statement with B Pollack based upon court record and follow up communication with UST	.60	492.00
7/27/22	BLP	Emails with UST re certain plan provisions (.2); emails with client re sale provisions of plan and amendment needed to same (.2)	.40	306.00
TOTAL PROFESSIONAL SERVICES				\$ 23,230.50
TOTAL THIS MATTER				\$ 23,230.50

JOSEPH KLAYNBERG
22420-001-8

Control #: 6992378
August 3, 2022

RE: RETENTION/PROFESSIONAL COMPENSATION/FEE

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/06/22	BLP	Work on June fee statement	.60	459.00
7/06/22	BLP	Begin drafting fee application	1.30	994.50
7/07/22	BLP	Finalize and send June fee statement	.20	153.00
7/08/22	BLP	Work on first interim fee application	.80	612.00
7/08/22	BLP	Comms with R. Banich re fee statement, application	.20	153.00
7/11/22	BLP	Continued work on fee application	.80	612.00
7/11/22	BLP	Comms with professionals re status of their fee applications	.20	153.00
7/12/22	BLP	Extensive work on fee application	3.40	2,601.00
7/12/22	BLP	Discussion with M. Peretz re accountant fee application	.20	153.00
7/12/22	BLP	Prepare and file all June fee statements in case	.70	535.50
7/13/22	BLP	Continued work on fee application and fee notice for all parties	1.30	994.50
7/13/22	BLP	Review special appellate counsel fee application and discussion re comments to same	.50	382.50
7/13/22	MGR	Review fee application, supporting declaration and proposed order and provide comments	.60	492.00
7/19/22	BLP	Review appellate counsel revised fee application and comment on same	.30	229.50
7/19/22	BLP	Review adversary counsel revised fee application and comment on same	.50	382.50
7/19/22	BLP	Review accountant fee application and comment on same	.30	229.50
7/19/22	BLP	Discussion with R. Banich re fee application (.2); discussion with A. Thaler re changes to fee application (.2)	.40	306.00
7/21/22	BLP	Review and file Thaler fee application (.2); review and file Banich fee application (.2)	.40	306.00
7/21/22	BLP	Review revised Flynn fee app and emails re same (.3); review further revisions to same (.2)	.50	382.50
7/22/22	BLP	File Flynn fee application (.2); emails re AOS filing, sending all applications to court (.2)	.40	306.00

JOSEPH KLAYNBERG
22420-001-8

Control #: 6992378
August 3, 2022

Date	Init	Description	Hours	Amount
7/27/22	BLP	Emails with professionals re fee hearing logistics	.20	153.00
TOTAL PROFESSIONAL SERVICES				\$ 10,590.00
TOTAL THIS MATTER				\$ 10,590.00

JOSEPH KLAYNBERG
22420-001-9

Control #: 6992378
August 3, 2022

RE: PREPARATION FOR/ATTEND COURT HEARING

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/19/22	BLP	Begin preparation for STN hearing	1.90	1,453.50
7/19/22	MGR	Review standing motion of NAHLA and reply and discuss issues for argument with B Pollack.	.60	492.00
7/20/22	BLP	Continued extensive preparation for STN hearing and review of case law re same	4.10	3,136.50
7/20/22	BLP	Attend STN hearing	1.00	765.00
7/20/22	MGR	Hearing on derivative standing	1.00	820.00
7/20/22	MGR	Conf w/ B Pollack regarding argument in opposition to derivative standing motion and preparation for hearing	.50	410.00
TOTAL PROFESSIONAL SERVICES				\$ 7,077.00
TOTAL THIS MATTER				\$ 7,077.00

JOSEPH KLAYNBERG
22420-001-12

Control #: 6992378
August 3, 2022

RE: OPERATING REPORTS

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/08/22	BLP	Review and comment on MOR	.40	306.00
7/11/22	BLP	File June MOR and send to UST	.20	153.00
TOTAL PROFESSIONAL SERVICES				\$ 459.00
TOTAL THIS MATTER				\$ 459.00

JOSEPH KLAYNBERG
22420-001-13

Control #: 6992378
August 3, 2022

RE: DISBURSEMENTS

DISBURSEMENTS

Date	Description	Amount
7/14/22	BONNIE POLLACK, OUTSIDE SERVICES, SCANNING LARGE DOCUMENT TO BE SENT TO OFFICE, BLP/KM	21.72
7/14/22	BONNIE POLLACK, OUTSIDE SERVICES, SCANNING LARGE DOCUMENT TO BE SENT TO OFFICE, BLP/KM	49.50
7/14/22	BONNIE POLLACK, OUTSIDE SERVICES, SCANNING LARGE DOCUMENT TO BE SENT TO OFFICE, BLP/KM	45.08
7/14/22	GC PHOTOCOPY, # of Copies: 3362 @ 0.10 per unit	336.20
7/14/22	GC PHOTOCOPY, # of Copies: 952 @ 0.10 per unit	95.20
7/15/22	POSTAGE 07/15/2022, SK/BP	89.19
7/15/22	POSTAGE 07/15/2022, SK/BP	110.10
7/15/22	GC PHOTOCOPY, # of Copies: 979 @ 0.10 per unit	97.90
7/15/22	GC PHOTOCOPY, # of Copies: 638 @ 0.10 per unit	63.80
7/22/22	POSTAGE 07/22/2022, SK/BP	17.28
7/22/22	GC PHOTOCOPY, # of Copies: 121 @ 0.10 per unit	12.10
7/27/22	ON-LINE RESEARCH (E106), MCNAMEE,KELLY, INV# 846612775	82.31
7/27/22	ON-LINE RESEARCH (E106), FRANZETTI,SARAH, INV# 846612775	63.61
7/27/22	ON-LINE RESEARCH (E106), FRANZETTI,SARAH, INV# 846612775	47.49
7/27/22	ON-LINE RESEARCH (E106), MCNAMEE,KELLY, INV# 846612775	7.90
7/27/22	ON-LINE RESEARCH (E106), MCNAMEE,KELLY, INV# 846612775	7.90
7/27/22	ON-LINE RESEARCH (E106), MCNAMEE,KELLY, INV# 846612775	15.79
7/27/22	ON-LINE RESEARCH (E106), MCNAMEE,KELLY, INV# 846612775	2.50
7/28/22	POSTAGE 07/28/2022, SK/BP	5.90
7/28/22	GC PHOTOCOPY, # of Copies: 90 @ 0.10 per unit	9.00
TOTAL DISBURSEMENTS		\$ 1,180.47
TOTAL THIS MATTER		\$ 1,180.47

JOSEPH KLAYNBERG
22420-001-14

Control #: 6992378
August 3, 2022

RE: TRAVEL

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/29/22	BLP	Travel to and from NYC for deposition	3.00	2,295.00
7/29/22	MGR	Travel to and from NYC for deposition of J Klaynberg	3.00	2,460.00
TOTAL PROFESSIONAL SERVICES				\$ 4,755.00
TOTAL THIS MATTER				\$ 4,755.00

JOSEPH KLAYNBERG
22420-001-16

Control #: 6992378
August 3, 2022

RE: NAHLA 2004 MOTION

PROFESSIONAL SERVICES

Date	Init	Description	Hours	Amount
7/01/22	BLP	Continued review/production of documents	2.80	2,142.00
7/05/22	BLP	Review additional document for production	.60	459.00
7/06/22	BLP	Lengthy discussions with client re documents in production, communications re matrimonial	.70	535.50
7/06/22	BLP	Continued review and production of documents	1.00	765.00
7/06/22	MGR	Review and advise on privilege issue concerning document production	.30	246.00
7/06/22	KM	Preparation of privilege log.	1.00	200.00
7/07/22	BLP	Review continued documents and conference re privilege log needed (.5); discussion with client re same (.2)	.70	535.50
7/08/22	BLP	Emails with client regarding discovery documents	.30	229.50
7/08/22	KM	Assisted in compilation of document production.	2.50	500.00
7/11/22	BLP	Review additional documents received from client for production	.50	382.50
7/11/22	KM	Preparation of privilege log.	.80	160.00
7/13/22	KM	Assisted in compilation of document production.	1.70	340.00
7/14/22	BLP	Continued work on document production matters	.40	306.00
7/14/22	BLP	Prepare status letter re discovery and compile documents re same	.40	306.00
7/14/22	KM	Assisted in compilation of document production.	.80	160.00
7/15/22	BLP	Finalize and file status letter re document production	.20	153.00
7/15/22	BLP	Review and respond to Nahla questions re document production (.4); comms with client re same (.3)	.70	535.50
7/18/22	BLP	Extensive work on remaining document production, preparation of privilege log	4.40	3,366.00
7/19/22	BLP	Finalize privilege log and production and send final production	1.20	918.00
7/19/22	BLP	Review Nahla status letter to court re discovery(.1); emails with Nahla and debtor re scheduling deposition (.2); emails with Nahla re Emily deposition (.1)	.40	306.00

JOSEPH KLAYNBERG
22420-001-16

Control #: 6992378
August 3, 2022

Date	Init	Description	Hours	Amount
7/19/22	BLP	Review Nahla order re debtor deposition and Schwab discovery (.2); comms with Nahla re same (.2)	.40	306.00
7/19/22	MGR	Discuss scheduling preparation issues w/ J Klaynberg Deposition	.50	410.00
7/21/22	BLP	Prepare outline of items for preparation for Nahla deposition	.50	382.50
7/25/22	BLP	Meeting with client to prepare for deposition	3.50	2,677.50
7/25/22	MGR	Conf w/ client and B Pollack in preparation for 2004 Deposition of J Klaynberg	2.50	2,050.00
7/27/22	BLP	Review Kovel documents and assemble for production (.3); emails re use of mediation charts at deposition (.1)	.40	306.00
7/27/22	MGR	Review document production in preparation for client 2004 exam	.50	410.00
7/28/22	MGR	Review mediation statements and org charts in preparation for deposition	1.20	984.00
7/29/22	BLP	Attend deposition and conference with client after same	7.00	5,355.00
7/29/22	MGR	Attend depostion of J Klaynberg	7.00	5,740.00
TOTAL PROFESSIONAL SERVICES				\$ 31,166.50
TOTAL THIS MATTER				\$ 31,166.50
TOTAL THIS INVOICE				\$ 103,413.47



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Tax ID: 11-0658700

JOSEPH KLAYNBERG

August 3, 2022
Control #: 6992378

REMITTANCE

Client.Matter: 22420

BALANCE DUE THIS INVOICE

\$ 103,413.47

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